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Attorneys for Plaintiff, ABBEY DENTAL CENTER, INC.

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

ABBEY DENTAL CENTER, INC., a Nevada
 Corporation,

Plaintiff,

vs.

CONSUMER OPINION LLC, a Nevada
 Limited liability company; DOES 1-10; and
 ROE ENTITIES 1-10, inclusive,

Defendant(s).

Case No. 2:15-cv-02069-GMN-PAL
STIPULATION AND (PROPOSED)
ORDER TO STAY PROCEEDINGS

Plaintiff, ABBEY DENTAL CENTER, INC., and Defendant, CONSUMER OPINION
 LLC, by and through their respective, undersigned counsel, do hereby stipulate and agree as
 follows:

1. The aforesaid parties are currently engaged in settlement negotiations.
2. In the meantime, to facilitate settlement and to minimize attorneys' fees and other
 legal expenses, the parties believe that the present civil action should be stayed.

3. Therefore, the parties agree that the Court may enter the following order and request that the Court do so accordingly:

a. Except as otherwise provided below, this action shall be stayed for a period of thirty (30) days from the date this stipulation is filed with the Court.

b. The stay shall immediately terminate upon Plaintiff's filing with the Court, and serving upon Defendant, a notice that Defendant must file an answer to Plaintiff's complaint in this action or otherwise respond to same in accordance with the *Federal Rules of Civil Procedure* and by no later than twenty-one (21) days after service of the notice.

c. The parties stipulate that nothing in this delay shall be deemed to prejudice Defendant's right to file an Anti-SLAPP motion, under NRS 41.635 *et. seq.*

SO STIPULATED AND AGREED on this 6th day of January, 2016.

THE AMIN LAW GROUP, NV., LTD.

RANDAZZA LEGAL GROUP, PLLC

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Attorney for Defendant

IT IS SO ORDERED.

UNITED STATES DISTRICT JUDGE

Dated: _____

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 6th of January 2016, I served a true and correct copy of:
STIPULATION AND (PROPOSED) ORDER TO STAY PROCEEDINGS, postage fully prepaid
and addressed to the following:

_____ serving the following parties via US Mail, postage prepaid;

 X serving the following parties via CM/ECF;

_____ serving the following parties via facsimile;

_____ serving the following parties via Overnight Express;

Marc J. Randazza, Esq.
3625 South Town Center Drive
Las Vegas, NV 89135
Attorney for Defendant

/s/ Teresa Armendariz
Teresa Armendariz
An Employee of THE AMIN LAW GROUP, NV., LTD.

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